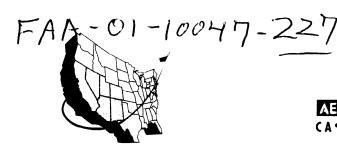
152923





Distributor For

SOCATA

AEROSPATIALE MATRA
CA•AZ•NV•UT•NM•CO

December 1, 2001

Docket Management System U.S. Department of Transportation Room Plaza 401 400 Seventh Street, S.W. Washington, D.C. 20590-0001

Ref: Docket No. FAA-2001-10047: Notice No 01-08

Dear Sir or Madam:

I have been following the FAA NPRM proposed revisions to Fractional Ownership Rules recently I notice the proposed rule would not apply the fractional ownership requirements of Part 91, Subpart K to multiple aircraft ownership arrangements such as flying clubs, co-ownership and other of non-commercial multiple aircraft ownership, is right on track. This is a sensible approach to legitimate concerns for the public interest in air safety.

However, in my view defining the aircraft excluded from NPRM Fractional Ownership application as "smaller piston powered single- and multi-engine aircraft that otherwise meet the five criteria of Part 91.1001, is too limiting for General Aviation. The existing, and coming generation of light single-engine turboprop aircraft is omitted from mention in the proposal. It is shortsighted to exclude the opportunity for individuals to share ownership in these light single-engine turboprops. More small turboprops are entering the market every day. They are almost exclusively purchased and used by private individuals and small companies in the conduct of their own business and for personal travel. The owners of these new generation single-engine turboprops do not make their airplanes available to the public. They, or their managers, control the maintenance of their aircraft and they know their passengers on a personal or professional basis. For the most part, the owner or the owner's company pilot flies these single-engine turboprop airplanes.

The multi-million dollar price tag for new single engine turboprop airplanes eliminates many prospective owners from acquiring such an aircraft. Yet, the ability to share an airplane with others drops the cost factor enough to make owning such an airplane possible for more individuals and smaller companies. By exempting such aircraft from fractional rule changes you will be extending the opportunities and advantages the single engine turboprops can bring to General Aviation.

There exist today instances of partnerships which have been formed by individuals who have joined together to buy this high cost single-engine turboprops for there own private use. This is no different that similar partnerships to own light piston engine-single and multi-engine aircraft. Therefore, I would like to ask you to consider in your NPRM light, single-engine turboprop airplanes with a gross takeoff weight of 8,000 pounds or less and having multiple owners the criteria for **Part 91 operations**. Thank you for your consideration of my position on the NPRM activity. Should you have any questions or concerns, please call me at (805) 389-1188, ext. #14.

Sincerely,

Walter H. Adair, Jr.

General Manager, The New Avex, Inc.

Walk W. Adail

AOPA #01091114

Copy: Mr. R. Anderson Pew, Chairman

AOPA Board of Trustees

Mr. Paul C. Heintz, Vice Chairman

AOPA Board of Trustees

Mr. Andrew Cebula, Senior Vice President AOPA Department of Government and Technical Affairs